

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DENGCHENG CHEN,

Petitioner,

v.

PAMELA BONDI, *et al.*,

Respondents.

Case No. 25 Civ. 8098 (JGLC)

RETURN TO HABEAS PETITION

Under 28 U.S.C. § 2243, the government respectfully submits this Return, together with the accompanying Memorandum of Law in Opposition to the Petition for Writ of Habeas Corpus (“Petition”), filed by petitioner Dengcheng Chen (ECF No. 1), and the Declaration of Mincheol So dated December 8, 2025 (ECF No. 26). The attached documents are taken from Dengcheng Chen’s administrative file, as maintained by and provided to this Office by U.S. Immigration and Customs Enforcement.

1. Exhibit A is a copy of the Notice to Appear, dated July 21, 2017, and served on Chen on July 24, 2017.

2. Exhibit B is a copy of the Additional Charges of Inadmissibility/Deportability (Form I-261), filed in Chen’s immigration proceedings on June 14, 2021.

3. Exhibit C is a copy of the December 14, 2022, Release Notification, notifying Chen of ICE’s conclusion that he would be released from ICE custody pursuant to an Order of Supervision pending removal from the United States.

4. Exhibit D is a copy of the Order of Supervision issued to Chen on December 15, 2022.

5. Exhibit E is a copy of a decision to continue detention, dated September 3, 2025, reflecting that ICE reviewed Chen's custody status and determined that he would remain detained.

6. Exhibit F is a copy of the Permit for Entry, dated October 10, 2025, issued by the Embassy of the People's Republic of China and permitting Chen to return to China within three months from the date of its issuance.

The facts contained in Exhibits A through F, and in the December 8, 2025, Declaration of Deportation Officer Mincheol So, and the law set forth in the government's Memorandum of Law in Opposition to the Petition, establish that Dengcheng Chen's detention is lawful.

WHEREFORE, the government respectfully requests that the Court enter judgment denying the Petition.

Dated: New York, New York
December 8, 2025

Respectfully submitted,

JAY CLAYTON
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Southern District of New York
Attorney for Respondents

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